

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

SECURITIES AND EXCHANGE COMMISSION,  
Plaintiff,  
v.  
MICHAEL A. LIBERTY; BRITTANY LIBERTY;  
PAUL HESS; RICHARD LIBERTY;  
GEORGE J. MARCUS;  
MOZIDO INVESCO, LLC;  
FAMILY MOBILE, LLC; BRTMDO, LLC  
BRENTWOOD FINANCIAL, LLC; and  
TL HOLDINGS GROUP, LLC  
Defendants,  
and  
XANADU PARTNERS, LLC  
Relief Defendant

## LIBERTY DEFENDANTS' FOURTH STATUS REPORT

**COME NOW**, Defendants Michael A. Liberty, Mozido Invesco, LLC, Family Mobile, LLC, BRTMDO, LLC, Brentwood Financial, LLC, and TL Holdings Group, LLC (the “Liberty Defendants”), by and through their undersigned attorneys, and pursuant to the Court’s August 8, 2019 *Order on Defendants’ Fourth Motion to Stay Civil Proceedings* (ECF No. 73), hereby provide the following Status Report on the progress of the criminal case against Messrs. Liberty and Hess.

Due to the COVID-19 pandemic, on February 24, 2020 the Court (Singal, J.) continued Mr. Liberty's criminal trial until April, 2021. *See Speedy Trial Order*, Docket No. 2:19-cr-

00030-GZS, ECF No. 159. Jury selection remains scheduled for April 5, 2021, with trial commencing on April 26, 2021 and lasting for five weeks. *See Amended Trial Scheduling Order*, Docket No. 2:19-cr-00030-GZS, ECF No. 161. The Court has informed the parties that the trial dates are firm and will not be continued. That said, the impact, if any, of the public health crisis on the trial schedule going forward remains unknown.

Dated at Portland, Maine this 3rd day of November, 2020.

/s/ Thimi R. Mina  
Thimi R. Mina

/s/ Jay P. McCloskey  
Jay P. McCloskey

/s/ Alfred C. Frawley IV  
Alfred C. Frawley IV

McCloskey, Mina, Cunniff & Frawley, LLC  
12 City Center  
Portland, Maine 04101  
(207) 772-6805  
(207) 879-9375  
[tmina@lawmmc.com](mailto:tmina@lawmmc.com)  
[jmccloskey@lawmmc.com](mailto:jmccloskey@lawmmc.com)  
[afrawley@lawmmc.com](mailto:afrawley@lawmmc.com)

PRO HAC VICE:

/s/ Jay A. Dubow  
Jay A. Dubow

/s/ Richard J. Zack  
Richard J. Zack

/s/ Abigail A. Hazlett  
Abigail A. Hazlett

/s/ Craig G. Steen  
Craig G. Steen

Pepper Hamilton LLP  
18<sup>th</sup> and Arch Streets, Two Logan Square

Philadelphia, Pennsylvania 19103

(215) 981-4000

(215) 981-4750

[dubowj@pepperlaw.com](mailto:dubowj@pepperlaw.com)

[zackr@pepperlaw.com](mailto:zackr@pepperlaw.com)

[hazletta@pepperlaw.com](mailto:hazletta@pepperlaw.com)

[steenc@pepperlaw.com](mailto:steenc@pepperlaw.com)

*Attorneys for Defendants Michael A. Liberty,  
Mozido Invesco, LLC, Family Mobile, LLC,  
BRTMDO, LLC, Brentwood Financial, LLC  
and TL Holdings Group, LLC*

**CERTIFICATE OF SERVICE**

I, Alfred C. Frawley IV, hereby certify that on this November 3, 2020, I caused the foregoing **LIBERTY DEFENDANTS' FOURTH STATUS REPORT** to be filed with the Court's CM/ECF system, which will send notification of this filing to all counsel of record.

Dated at Portland, Maine this 3<sup>rd</sup> day of November, 2020.

/s/ Alfred C. Frawley IV  
Alfred C. Frawley IV

McCloskey, Mina, Cunniff & Frawley, LLC  
12 City Center  
Portland, Maine 04101  
(207) 772-6805  
(207) 879-9375  
[afrawley@lawmmc.com](mailto:afrawley@lawmmc.com)

*Attorneys for Defendants Michael A. Liberty,  
Mozido Invesco, LLC, Family Mobile, LLC,  
BRTMDO, LLC, Brentwood Financial, LLC  
and TL Holdings Group, LLC*